

BLANK ROME LLP
Attorneys for Plaintiff
Jeremy J.O. Harwood
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5149

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SISTEM MÜHENDISLIK INSAAT SANAYI VE
TICARET, A.Ş.,

Plaintiff,

v.

THE KYRGYZ REPUBLIC,

Defendant.

Civil Action No. 12-cv-4502 (ALC)

**SUPPLEMENTAL AFFIDAVIT OF
JEREMY J.O. HARWOOD IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

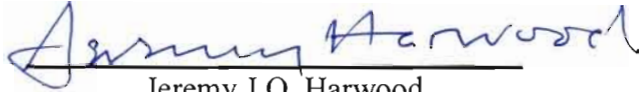
STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

JEREMY J.O. HARWOOD being duly sworn, deposes and says:

1. I am a partner of Blank Rome LLP and lead counsel in this matter. I am familiar with all the facts and circumstances in this action.


2. I make this affidavit in further support of plaintiff SISTEM MÜHENDISLIK INSAAT SANAYI VE TICARET, A.Ş.'s Motion for Default Judgment against defendant, THE KYRGYZ REPUBLIC ("Kyrgyz") pursuant to 28 U.S.C. § 1608(e), and Rule 55 of the Federal Civil Rules of Civil Procedure.

3. I attach as Exhibit "1" hereto a true copy of an ICSID arbitration award dated September 13, 2007 in ICSID Case No. ARB/(AF)/06/1.


Jeremy J.O. Harwood

Sworn to before me this
31st day of July, 2013


NOTARY PUBLIC


KARL V. REDA
Notary Public, State of New York
No. 30-4783126, Qual. in Nassau Cty.
Certificate Filed in New York County
Commission Expires Nov. 30, 2013
30-4783126